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November 19, 2021

By ECF

Alvin K. Hellerstein
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The request is granted. So ordered.
/s/ Alvin K. Hellerstein
November 22, 2021

Re: United States v. Joseph Campbell
20 Cr. 631 (AKH)

Dear Judge Hellerstein:

I represent Joseph Campbell, the defendant in the above-named matter. Mr. Campbell is currently released on bail and subject to home detention. This letter is respectfully submitted to request a temporary modification of my client's bail conditions to permit him to travel to Albany, New York from November 25 to November 26, 2021 to spend Thanksgiving with his family. Pre-Trial Services, by Officer Jonathan Lettieri, objects to this request, noting that it is the policy of Pre-Trial Services to object to social activities or overnight travel outside the district for defendants on home detention. The government, by Alexander Li, takes no position.

Mr. Campbell is charged in Count One of the instant Superseding Indictment with Narcotics Conspiracy in violation of 21 U.S.C. § 846 and § 841(b)(1)(A). He is not alleged to have been involved in any violence. On December 3, 2020, Mr. Campbell was released on his own signature pursuant to a \$50,000 personal recognizance bond co-signed by three financially responsible persons. His bail conditions include, among other things, home detention, location monitoring, travel restricted to the Southern and Eastern Districts of New York, and the requirement that he find and maintain employment.

Throughout his pretrial release, Mr. Campbell has been fully compliant with his bail conditions. He is serving his home detention at a home shared with his sister, Tarchae Campbell (a co-signer on Mr. Campbell's bond), who works in customer service, and his uncle, Joseph Johnson, who works as a custodian. He has been consistently working for the last nine months.

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Approximately two months after his arrest and release on bail on December 3, 2020, Mr. Campbell obtained employment loading and unloading trucks for Innovative Distribution Services, a warehouse and distribution center located in Bronx, New York. He continues to work there today, working five days a week, from 3:00 a.m. to 11:00 a.m. Throughout this time, he has abided by his curfew and the requirements of his home detention, as confirmed to counsel by Officer Lettieri.

Given these circumstances, it is respectfully requested that the Court temporarily modify Mr. Campbell's bail conditions to permit him to travel to Albany for Thanksgiving. If this application is granted, Mr. Campbell plans to drive to Albany on Thanksgiving Day, November 25, 2021, and return November 26, 2021. He plans to travel with his girlfriend of five years, Charlene Beeker, and to stay at the home of his sister, Kasha Johnson (who is also one of Mr. Campbell's co-signers), located at an address that has been provided to Pre-Trial Services.

Notably, Mr. Campbell comes from a large, close-knit family. In attendance at Thanksgiving dinner this year will be Mr. Campbell's girlfriend, mother, siblings, cousins, aunts, uncles, nieces and nephews, some of whom Mr. Campbell only sees on holidays. This is a significant family event for Mr. Campbell, whose family traditionally celebrates Thanksgiving at the home of his sister, Kasha, who moved to Albany from New York City several years ago. Ms. Johnson has two children, ages ten years and 20 months, whom Mr. Campbell is eager to spend time with. Also living in Albany is Mr. Campbell's younger brother, Joshua Johnson, who is a student at SUNY Albany, as well as his maternal aunt, Maxine Johnson, and her children. Prior to his arrest, Mr. Campbell regularly saw his family in Albany, but given his travel restrictions, his personal contact has been limited. Therefore, Mr. Campbell hopes for the opportunity to spend time with his family on what is an important holiday for them, and especially looks forward to seeing his sister, brother, and his young nieces and nephews.

If the Court has any questions regarding this application, it is respectfully requested the undersigned be contacted. Thank you very much for your attention.

Respectfully,

Robert A. Soloway

Robert A. Soloway

cc: AUSA Alexander Li

(by ECF)

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